

**IN THE UNITED STATES DISTRICT COURT
FOR THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

Defendants.

EXHIBIT	DESCRIPTION	OBJECTIONS
A	Notice of Non-renewal of contract signed by Plaintiff dated 4/14/98	Not Relevant, 402. The relevant time period here is between October, 2004 and the present.
B	Reprimand letter to Plaintiff from Koblerville Elementary School dated 11/7/01.	Not Relevant, 402 and 403. Character, 404.
C	Reprimand letter to Plaintiff from Koblerville Elementary School dated 3/22/02	Not Relevant, 402 and 403. Character, 404.
D	Plaintiff's leave request at Koblerville Elementary School 3/06/02	Not Relevant, 402 and 403. Character, 404.
E	Denial of leave request from Koblerville Elementary School dated 3/08/02	Not Relevant, 402 and 403. Character, 404.
F	PSS Personnel Action, Hopwood Junior	No Objection.

1		High School regarding Plaintiff's employment effective date 6/5/04 through 7/30/05	
2			
3	G	PSS Personnel Action and Contract regarding Plaintiff's employment effective 3/04/04 through 6/04/04	No Objection.
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5	H	Memo to Plaintiff from Defendant Brewer dated 09/08/04 regarding classroom	No Objection.
6			
7	I	Reprimand Letter to Plaintiff from Hopwood Junior High School dated 1/11/05	No Objection.
8	J	Hopwood substitute schedules 12/20/04-12/22/04	No Objection.
9	K	Hopwood Teacher Bulletins 12/13/04, 12/17/04, 12/22/04	No Objection.
10			
11	L	Memo to Jim Brewer from Vice Principal Administration and Discipline regarding substitution dated 1/11/05	Hearsay, 802.
12	M	Memorandum regarding student concerns about Plaintiff dated 1/31/05	Hearsay, 802.
13			
14	N	Reprimand Letter to Plaintiff from Hopwood Junior High School dated 2/14/05	No Objection.
15			
16	O	Letter of concern to Plaintiff from Hopwood Junior High School dated 2/14/05	No Objection.
17			
18	P	Letter to Defendant Brewer from Teacher Christine Halloran regarding student complaint about Plaintiff dated 2/14/05	Hearsay, 802.
19			
20	Q	Letter of Concern to Plaintiff from Hopwood Junior High School dated 4/18/05	No Objection.
21	R	Plaintiff's Performance Appraisal dated 4/05	No Objection.
22	S	Notice of Non-renewal of Plaintiff's contract dated 4/22/06	No Objection.
23			
24	T	Facsimile to Bob Schwalbach from Defendant Brewer regarding Plaintiff's grant awards dated 3/7/05	No Objection.
25			
26	U	Incident Report/Complaint regarding Plaintiff from Teacher Rory Starkey dated 2/8/05	Hearsay, 802. Relevance, 403. Character, 404.
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28			

1	V	Letter from Teacher Katherine Barja to Defendant Brewer regarding Plaintiff dated 3/8/05	Hearsay, 802. Relevance, 403. Character, 404.
2			
3	W	Memo to all staff from Defendant Brewer regarding tardy students dated 3/18/05	No Objection.
4			
5	X	Memo to Plaintiff from Defendant Brewer regarding status of grievance dated 4/21/05	Relevance, 403.
6			
7	Y	Memo to teacher Katherine Barja from Defendant Brewer regarding holding students back dated 4/26/05	No Objection.
8			
9	Z	Memo to Plaintiff from Defendant Brewer regarding late students dated 4/26/05	No Objection.
10			
11	AA	Memo to PSS Commissioner of Education from Human Resources Officer regarding Plaintiff's grievance against Barja and Starkey dated 5/23/05	Relevance, 402 and 403.
12			
13	BB	Memo to Commissioner from Marianas High School Principal regarding Plaintiff 7/26/05	No Objection.
14			
15	CC	Facsimile letter to Plaintiff from PSS Human Resources Officer regarding Plaintiff's rejection of transfer dated 7/29/05	Hearsay, 802. Relevance, 402 and 403. Settlement, 408. If Defendant's "CC" is admitted then Plaintiff's "17" (attached) should be admitted.
16			
17	DD	Notice of Personnel Action regarding Plaintiff's separation from employment effective 7/31/05	No Objection.
18			
19	EE	Plaintiff's application forward request dated 7/06/05	No Objection.
20			
21	FF	Plaintiff's Employment Application dated 12/19/03	No Objection.
22			
23	GG	Plaintiff's Certification Application dated March 2004	No Objection.
24			
25	HH	E-mails between Defendant Brewer and Austin Briggs regarding Plaintiff dated 09/12/05 and 9/15/05	As to the September 12 and September 15, 2005 Responses from Austin Briggs Jr. only: Hearsay, 802. Relevance, 402 and 403. Character, 404. Authentication, 901. Not an original, 1002.
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1	II	E-mails between Defendant Brewer and Brad Latzke regarding Plaintiff dated 9/13/05 and 9/15/05	Hearsay, 802. Character, 404. Relevance, 402 and 403. Authentication, 901. Not an original, 1002.
2	JJ	Board of Education decision regarding Plaintiff's grievance dated 11/9/05	Relevance, 402 and 403
3	KK	Classroom Teacher Eligibility List dated 2/02/06	No Objection.
4	LL	Classroom Teacher Eligibility List dated 3/2/06	No Objection.
5	MM	Classroom Teacher Eligibility List dated 4/24/06	No Objection.
6	NN	Head Start Component Coordinator Eligibility List and Selection dated 6/20/06	No Objection.
7	OO	PSS Regulations for Certified Personnel 1997	No Objection.
8	PP	Board of Education Regulation 6450 regarding Grading System	No Objection.
9	QQ	Amendments to PSS Regulations For Certified Personnel 1997 regarding Hiring, Leave and Teacher Certification	No Objection.
10	RR	Plaintiff's Response to Defendant PSS' First Set of Interrogatories	Objections as stated in the Exhibit. Further, the proper use of discovery requests is to impeach the witness if the witness contradicts a prior answer, and not as substantive evidence. Otherwise it is hearsay under 802.
11	SS	Payment Summary and checks-Northern Marianas Academy	No Objection.
12	TT	American Education Institute check	No Objection.
13	UU	American Educational Academy Payment Summary	No Objection.
14	VV	E-mail regarding work with Alexis Fallon	Hearsay, 802. Character, 404. Relevance, 402 and 403.
15	WW	USANA Associate Earnings Statement	No Objection.
16	XX	Casablanca American School Statement of Earnings and checks	No Objection

YY

Casablanca American School Contract
of Employment

No Objection.

Plaintiff will raise the above objections when Defendant seeks to introduce an exhibit that has been objected to, or, if the Court schedules a time to hear in limine motions prior to trial, Plaintiff will make the objections to the Court at that time.

Dated: February 6, 2007

O'CONNOR BERMAN DOTTS & BANES
Attorneys for Plaintiff Lisa BlackBy: _____/s/_____
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August 1, 2005

Delivered by Fax

FAXED
8/1/05

Charley Kenty
Human Resource Officer
Public School System
P.O. Box 501370
Saipan, MP 96950
Fax: 664-3798

Re: Lisa Black

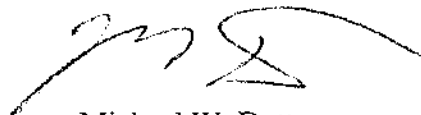
Dear Mr. Kenty:

I write on behalf of Lisa Black. In your letter dated July 29, 2005, you write that Ms. Black stated she "did not want to transfer". I suspect that there was a miscommunication. Ms. Black desires to work. She does not want to waive certain claims that she has. A transfer will not waive those claims. Therefore, if the most convenient way to get Ms. Black back into a classroom is by renewing her contract with Hopwood and then transferring her to MHS, please do so.

A transfer is acceptable to Lisa Black so long as she is not required to waive any claims by accepting the transfer.

I have asked Lisa Black to visit with your office this afternoon so that if you need anything from her to effectuate her transfer to MHS it can be accomplished.

Very truly yours,



Michael W. Dotts

cc: Heather Kennedy
Lisa Black